

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

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UGOCHUKWU GOODLUCK NWAUZOR, )  
FERNANDO AGUIRRE-URBINA, )  
individually and on behalf of )  
all those similarly situated, )  
 )  
Plaintiffs/Counter-Defendants. )  
 )  
vs. ) NO. 3:17-CV-05769-RJB  
 )  
THE GEO GROUP, Inc., )  
 )  
Defendant/Counter-Claimant. )

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DEPOSITION UPON ORAL EXAMINATION OF SEAN MURPHY

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Thursday, December 19, 2019  
Tumwater, Washington

NWAUZOR vs GEO GROUP  
Sean Murphy, 12/19/2019

1 A So what I can -- what I can tell you about is folks that  
2 are at the hospitals, and I can tell you about the folks  
3 that are at the Special Commitment Center, and I can tell  
4 you that those folks, we are definitely seeking ways to  
5 help them be -- to live -- live and lead meaningful lives,  
6 and part of that has a vocational component.

7 Q (By Ms. Mell) And those individuals have skills that they  
8 come into the facilities with, correct?

9 A There are a variety of skill sets that people come in with  
10 based on their -- the challenges that they're in the  
11 respective facility for. Many of the folks that we work  
12 with are developmentally disabled or have significant  
13 impairments due to mental illness, those types of things,  
14 and so the skill sets that they have definitely differ from  
15 person to person.

16 So one job may very well be that we pay the person  
17 to -- and this is an example -- to prepare their own meal  
18 in preparation for them trying to live independently as  
19 they move out. Someone else we may try and work into a  
20 program where they work with wood or crafts or chairs or  
21 something like that. All things that are just really  
22 designed to try and give them some level of skills,  
23 exercise their mind, and it's really individual and  
24 dependent on each individual's specific needs.

25 Q So is it correct that the State and, in your case, DSHS,

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1 Q Do you have reason to believe that without knowing the  
2 specific wage that state minimum wages are higher?

3 A **Again, I don't know what the state minimum wage is.**

4 Q Do you think that the State is paying less than it would  
5 have to pay employees hired by the State to do the same  
6 work?

7 MS. BRENNEKE: Object to the form of the  
8 question. Misstates his prior testimony.

9 A **So the work that's done is individualized for each**  
10 **particular resident or patient, and so the way that I**  
11 **understand our work programs, we wouldn't be paying someone**  
12 **to do that work.**

13 Q (By Ms. Mell) How would the work get done?

14 A **The jobs that we do are jobs that are designed around the**  
15 **patients' needs and not work that's purposeful and**  
16 **necessary and meaningful in the same way. It's not a**  
17 **requirement for operations.**

18 Q So how would the individuals' needs be met by the State  
19 while these individuals are in the State custody if the  
20 individuals didn't do the work themselves?

21 MS. BRENNEKE: Object to the form.

22 A **The individuals' needs be met? So part of the vocational**  
23 **program is to help support the patients' needs, and to your**  
24 **question, if I understand it correctly, is: How would**  
25 **those needs be met if they weren't doing that work?**

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C E R T I F I C A T E

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I, DIXIE J. CATTELL, the undersigned Registered Professional Reporter and Washington Certified Court Reporter, do hereby certify:

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That the foregoing deposition of SEAN MURPHY was taken before me and completed on the 19th day of December, 2019, and thereafter transcribed by me by means of computer-aided transcription; that the deposition is a full, true and complete transcript of the testimony of said witness;

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That the witness, before examination, was, by me, duly sworn to testify the truth, the whole truth, and nothing but the truth, and that the witness reserved signature;

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That I am not a relative, employee, attorney or counsel of any party to this action or relative or employee of such attorney or counsel, and I am not financially interested in the said action or the outcome thereof;

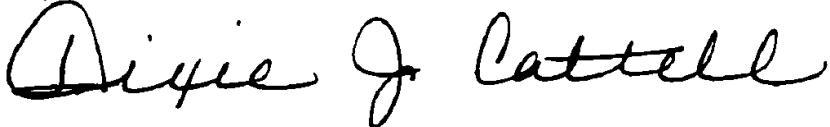
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That I am herewith securely sealing the deposition of SEAN MURPHY and promptly serving the same upon MS. JOAN MELL.

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IN WITNESS HEREOF, I have hereunto set my hand this 23rd day of DECEMBER, 2019.

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Dixie J. Cattell, RPR, CCR

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NCRA Registered Professional Reporter

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Washington Certified Court Reporter CSR#2346

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